

EXHIBIT “C”

Allentown, Pennsylvania (the “Settlement Class Area”); or (ii) resided within a residential property located within the Settlement Class Area. Notwithstanding the foregoing, the following persons are excluded from the “Settlement Class”: (i) officers, directors, and members of the Boards of Defendant; (ii) the presiding judicial officer (Honorable Edward G. Smith) and his staff; and (iii) Class Counsel, counsel for Defendant, and their respective staffs.

- b. Conditionally designates Mark and Lori Fuehrer as the Class Representatives of the Settlement Class; and
- c. Conditionally designates Kevin S. Richardson, Esquire, Steven D. Liddle, Esquire, Laura L. Sheets, Esquire, and Matthew Z. Robb, Esquire as Class Counsel for the Settlement Class.
- d. Establishes _____, 2021 as the deadline for submitting Opt-Out Forms to Class Counsel;
- e. Establishes _____, 2021 as the deadline for Settlement Class Members to submit Proofs of Claim;

3. A fairness hearing shall be held on _____, 2021 at :00 .m. before the Honorable Edward G. Smith by telephone conference call by dialing 571-353-2300 and entering pin 363973916# to consider whether the Court should give final approval to the proposed settlement, including a determination of the Class Representatives’ award and award of attorneys’ fees and costs to Class Counsel;

4. Objections to the settlement by Class Members will be considered by the Court only if such objections are submitted in writing to Class Counsel and are postmarked on or before _____, 2021. In any such written objection, Class Members shall state with

specificity the basis for their objections and the evidence, if any, they want to submit in support of their objections. Class Counsel shall serve the Defendant and file with the Court copies of all such objections on or before _____, 2021, together with a statement of reasons, if any, why the objections should be overruled;

5. At the fairness hearing, class members may, at the discretion of the Court, be heard orally in opposition to the settlement, provided that such persons serve on Class Counsel, on or before _____, 2021, written notification of their desire to appear personally and that such persons have submitted to Class Counsel written objections in accordance with Paragraph 4 above. Upon receipt thereof, Class Counsel shall serve the Defendant with copies of all such requests to be heard;

6. Class Counsel and Defendant's counsel should be prepared at the hearing to respond to any written objections filed by the Class Members and to provide other information, as appropriate, bearing on whether the settlement should be approved; and,

7. The Court APPROVES the following:

- a. the Notice of Proposed Settlement of Class Action, in the form attached to the Settlement Agreement as Exhibit "4";
- b. the Summary Notice of Proposed Class Action Settlement, in the form attached to the Settlement Agreement as Exhibit "5"; and
- c. the Proof of Claim, in the form attached to the Settlement Agreement as Exhibit "6."

These are the only notices required to be given to the Class Members, and these notices satisfy the requirements of due process and of Federal Rules of Civil Procedure 23(e). Class Counsel

are directed to give notice of the hearing and proposed settlement to the Class Members in accordance with the terms of the Settlement Agreement.

BY THE COURT:

Edward G. Smith, J.